EXHIBIT O

1   KEKER & VAN NEST LLP
    ROBERT A. VAN NEST - # 84065
2   rvannest@kvn.com
    CHRISTA M. ANDERSON - # 184325
3   canderson@kvn.com
    DANIEL PURCELL - # 191424
4   dpurcell@kvn.com
    633 Battery Street
5   San Francisco, CA 94111-1809
    Telephone: (415) 391-5400
6   Facsimile: (415) 397-7188

7   KING & SPALDING LLP
    BRUCE W. BABER (pro hac vice)
8   bbaber@kslaw.com
    1185 Avenue of the Americas
9   New York, NY 10036
    Tel: (212) 556-2100
10 Fax: (212) 556-2222

11 Attorneys for Defendant
    GOOGLE INC.

12   UNITED STATES DISTRICT COURT

13   NORTHERN DISTRICT OF CALIFORNIA

14   SAN FRANCISCO DIVISION

15

16 ORACLE AMERICA, INC.,   Case No. CV 10-03561 WHA

17   Plaintiffs,   **DEFENDANT GOOGLE INC.'S**
                                             RESPONSES AND OBJECTIONS TO
18   v.   **PLAINTIFF ORACLE AMERICA, INC.'S**
                                             REQUESTS FOR ADMISSION
19 GOOGLE INC.,
                                             SET THREE
20   Defendant.

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1   scope of this case.

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3   **REQUEST FOR ADMISSION NO. 281:**

4   Admit that GOOGLE intends to use some or all of ANDROID, including DECLARING

5   CODE and SSO from the 37 JAVA API PACKAGES, to create a platform that runs on desktops

6   and laptops.

7   **RESPONSE TO REQUEST FOR ADMISSION NO. 281:**

8   In addition to its General Objections, Google objects to this Request for Admission as

9   vague, ambiguous, overly broad, and not reasonably calculated to lead to the discovery of

10 admissible evidence as a result of its use of the defined phrases "Google," "intends to use," "some

11 or all of ANDROID, including DECLARING CODE and SSO from the 37 JAVA API

12 PACKAGES," and "platform that runs on desktops and laptops." Google objects to this Request

13 for Admission as overly broad, unduly burdensome, and not proportional to the needs of the case

14 to the extent it seeks information not related to any party's claims or defenses or any relevant

15 subject matter at issue, and that go beyond the permissible scope of this retrial. Google further

16 objects to this Request for Admission to the extent that it seeks information not within Google's

17 possession, custody or control.

18 Subject to and without waiving the foregoing objections and the General Objections, and

19 to the extent that this request is understood, Google denies this Request for Admission.

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21 **REQUEST FOR ADMISSION NO. 282:**

22 Admit that in 2009, GOOGLE believed that if it was slow to develop software for

23 MOBILE DEVICES, GOOGLE would fail to capture a significant share of the increasingly

24 important mobile market for search services and such failure would adversely affect GOOGLE'S

25 business.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 282:**

27 In addition to its General Objections, Google objects to this Request for Admission as

28 vague, ambiguous, overly broad, and not reasonably calculated to lead to the discovery of

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1 to the extent it seeks information not related to any party's claims or defenses or any relevant

2 subject matter at issue, and that go beyond the permissible scope of this retrial. Google also

3 objects to this Request for Admission as unreasonably cumulative or duplicative to the extent that

4 it seeks information that is more conveniently or less expensively obtained from another source or

5 that is publicly available. Google also objects to this Request as improperly compound. Google

6 objects to this Request for Admission to the extent it purports to include software created,

7 modified, and/or distributed by third parties and not Google. Google further objects to this

8 Request for Admission to the extent that it seeks information not within Google's possession,

9 custody or control.

10   Subject to and without waiving the foregoing objections and the General Objections, and

11 to the extent that this request is understood, Google denies this Request for Admission.

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13 Dated: December 4, 2015   KEKER & VAN NEST LLP

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                                                      By: /s/ *Robert A. Van Nest*
15   ROBERT A. VAN NEST
                                                            CHRISTA M. ANDERSON
16   DANIEL PURCELL

17   Attorneys for Defendant
                                                            GOOGLE INC.

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